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June 29, 2021

Via CM/ECF

The Honorable Jennifer L. Hall
United States District Court, District of Delaware
J. Caleb Boggs Federal Building
844 N. King Street
Unit 17
Room 3124
Wilmington, DE 19801

Re: Szubielski v. Pierce C.A. No. 15-984-JLH

Dear Judge Hall:

Per Judge Andrews's instructions at the pre-trial conference, please find enclosed Defendant's proposed limiting instruction, for the preliminary jury instructions, regarding the timeframe that the jury may consider for damages if Defendant were found liable.

I am available to the Court if this letter raises any questions.

Respectfully Submitted,

/s/ Kenneth L. Wan Kenneth L. Wan Deputy Attorney General

Encl.

CC: All counsel of record (Via CM/ECF)